

DEAR CLERK OF COURTS,

PLEASE FIND MY ORIGINAL & COPIES  
OF MY 1983. PLEASE FORWARD TO  
ME A TIME STAMPED COPY FOR MY  
RECORDS & PLEASE PROVIDE INFORMATION  
OF PROPER SERVICE UPON DEFENDENTS.

THANK YOU,

SCOTT SZILAGYI  
1414 E. 4<sup>TH</sup> ST.  
BETHLEHEM, PA. 18015-2044

FORM TO BE USED BY A PRISONER FILING A  
42 U.S.C. § 1983 CIVIL RIGHTS COMPLAINT  
IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

I. CAPTION

Scott Szilagyi

(Enter the full name of the plaintiff or plaintiffs)

v.

Sandy Foster-McClure

Robert Shupp III

Nicholas Szmodis

(Enter the full name of the defendant or defendants)

II. PARTIES

a. Plaintiff

Full name: Scott Szilagyi

Prison Identification number: 4690

Place of present confinement: Northampton County Prison (N.C.P.)

Address: 666 WALNUT Street, Easton Pa. 18042

Place of confinement at time of incidents or conditions alleged in complaint, including address:

Northampton County Prison, 666 WALNUT St. Easton, PA 18042

Additional plaintiffs: Provide the same information for any additional plaintiffs on the reverse of this page or on a separate sheet of paper.

b. Defendants: (list only those defendants named in the caption of the complaint, section I)

1. Full name including title: A.D.A Sandy Foster-McClure

Place of employment and section or unit: Northampton County D.A.'s Office

2. Full name including title: Robert Shupp III, Chief of Police

Place of employment and section or unit: Hellertown Police Dept. Chief

3. Full name including title: Nicholas Szmodis, Officer

Place of employment and section or unit: Hellertown Police Dept., OFFICER

4. Full name including title: \_\_\_\_\_

Place of employment and section or unit: \_\_\_\_\_

Additional defendants: Provide the same information for any additional defendants on the reverse of this page or on a separate sheet of paper.

## III. PREVIOUS LAWSUITS

## Instructions:

If you have filed other lawsuits in any federal or state court dealing with the same facts as this complaint or other facts related to your imprisonment, you must provide the information requested below. If you have not filed other lawsuits, proceed to Section IV, Administrative Remedies, on this page.

If you have filed other lawsuits, provide the following information.

## Parties to your previous lawsuit:

Plaintiffs No Previous Law Suits exist as this Plaintiff

Defendants was 100% denied access to not only the

Issues: Courts, but refused any and all attempts at proper assistance by the Northampton County Prison.

Court: if federal, which district? N-A

if state, which county? N-A

Docket number: N-A Date filed: \_\_\_\_\_

Name of presiding judge: N-A

Disposition: (check correct answer(s)): Date: N-A

Dismissed \_\_\_\_\_ Reason? N-A

Judgment \_\_\_\_\_ In whose favor? N-A

Pending \_\_\_\_\_ Current status? N-A

Other \_\_\_\_\_ Explain N-A

Appeal filed? \_\_\_\_\_ Current status? N-A

Additional lawsuits. Provide the same information concerning any other lawsuits you have filed concerning the same facts as this action or other facts related to your imprisonment. You may use the back of this page or a separate sheet of paper for this purpose.

## IV ADMINISTRATIVE REMEDIES

## Instructions:

Provide the information requested below if there is an administrative procedure to resolve the issues you raise in this complaint. Examples of administrative procedures include review of grievances, disciplinary action, and custody issues. If no administrative procedures apply to the issues in this complaint, proceed to Section V, Statement of Claim, on page 4.



- a. Describe the administrative procedures available to resolve the issues raised in this complaint:

Type of procedure. (grievance, disciplinary review, etc.)

No relief available while Plaintiff was in custody.

Authority for procedure. (DC-ADM, inmate handbook, etc.)

N-A for this Action

Formal or informal procedure. N-A

Who conducts the initial review? N-A

What additional review and appeals are available? None! Plaintiff

was denied access to the courts while  
in custody. Also denied assistance within Jail.

- b. Describe the administrative procedures you followed to resolve the issues raised in this complaint before filing this complaint:

On what date did you request initial review? NOVEMBER 19<sup>TH</sup>, 2018

What action did you ask prison authorities to take? To provide Plaintiff  
with either a Law Library, or Form <sup>42</sup>USC 1983.

What response did you receive to your request? None Received

What further review did you seek and on what dates did you file the requests? oral

request to Judge Anthony Beltrami  
on several dates from

What responses did you received to your requests for further review?

Judge Beltrami either denied me  
any assistance, or said "take it up  
with my attorney, whom refused to act.

- c. If you did not follow each step of the administrative procedures available to resolve the issues raised in this complaint explain why?

The within named facility has No Law-Library  
in accord with state & Federal standards,  
thereby denying access to the courts.

## V. STATEMENT OF CLAIM

## Instructions:

State here as briefly as possible the facts of your case. Use plain language and do not make legal arguments or cite cases or statutes. State how each defendant violated your constitutional rights. Although you may refer to any person, make claims only against the defendants listed in the Caption, Section I. Make only claims which are factually related. Each claim should be numbered and set forth in a separate paragraph with an explanation of how the defendants were involved. Use the reverse of this page or a separate sheet of paper if you need more space.

## Statement of Claim:

All 3 Defendants acted in concert to cause an illegal D.O.I. For Profit, scam meant to both unjustly enrich the County, and raise their own status in both their jobs & communities. A.D.A. McClure allowed and encouraged Chief of Police Shupp, to cause the Department's main focus of operation: resources towards securing D.O.I. arrests by use of any means, mostly by illegal means of both "laying in wait," or by "entrapment," and by and through the illegal use of unregistered Confidential Informants who either worked at, or stayed at local drinking establishments, and then made contact with Officer Szmodis, who would then cause illegal traffic stops, as well conducting illegal field sobriety testing, all this in a well refined, pre-meditated

Instructions: Briefly state exactly what you want the Court to do for you.

## Relief sought:

To cause a Federal criminal investigation into the totally impossible number of D.O.I. related stops & arrests, to review this and numerous other cases involving the Mellertan Police Dept., and to oversee the reversal of wrongful convictions only achieved by the gross and willful deprivation of both state & federal civil rights.

## VII. DECLARATION AND SIGNATURE

I (we) declare under penalty of perjury that the foregoing is true and correct.

11/4/20

DATE

Scott Szlagyi

SIGNATURE OF PLAINTIFF(S)



## STATEMENT OF CLAIM

All 3 Defendants acted in concert to knowingly & willfully cause and operate an illegal D.O.I. for Profit Scam. Said Scam meant to unjustly enrich the Cnty, and to raise the personal status of the Defendants both personally and professionally.

① Deft. McClure: Allowed and encouraged Chief of Police Shupp, to cause the department's main focus of operations & resources towards securing D.O.I. arrests by use of illegal means such as 'laying in wait' and Entrapment. Also using un-registered Confidential Informants who either worked at, or stalked local drinking establishments, and then made contact with officer Szmodis, who would then cause illegal traffic stops, as well as conducting illegal field sobriety tests, all this in a well refined & premeditated process.

Deft McClure also denied Plaintiff a fair Trial by refusing to release Discovery materials that prove out these allegations.





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EL E. KUNZ, CLERK, U.S. District Court  
DISTRICT OF PENNSYLVANIA, 2609 U.S. COURTHOUSE  
MARKET ST.  
Philadelphia, PA. 19106-1797

S.M.S.  
X-BAY  
U.S.



SCOTT SZILAGYI  
1414 E. 4TH ST.  
BETHLEHEM, PA. 18015-2040

MICHAEL E. KUNZ, CLERK, U.  
EASTERN DISTRICT OF PENNS,  
601 MARKET ST.  
PHILADELPHIA, PA. 19106-11